

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

| | |
|--|-----------------------------|
| ----- | X |
| | : |
| In re: | : |
| | : |
| THE FINANCIAL OVERSIGHT AND | : PROMESA |
| MANAGEMENT BOARD FOR PUERTO RICO, | : Title III |
| | : |
| as representative of | : Case No. 17-BK-3283 (LTS) |
| | : |
| THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , | : (Jointly Administered) |
| | : |
| Debtors. ¹ | : |
| ----- | X |

NOTICE OF APPEARANCE AND REQUEST TO RECEIVE NOTIFICATIONS

PLEASE TAKE NOTICE that, pursuant to Rule 83D(a) of the Local Civil Rules of the United States District Court for the District of Puerto Rico, Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these proceedings by Section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. § 2170 et seq., and sections 102(1) and 1109(b) of title 11 of the

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

United States Code (the “Bankruptcy Code”), made applicable to these proceedings by Section 301 of PROMESA, Debevoise & Plimpton, LLP hereby enter their appearance in the above-captioned Title III case (the “Title III Case”) as counsel to GoldenTree Asset Management LP (“GoldenTree”). GoldenTree hereby requests, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, that all notice given or required to be given in these cases be served upon the undersigned counsel:

Andrew J. Ceresney
Lisa Zornberg

DEBEVOISE & PLIMPTON, LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-6000
Facsimile: (212) 909-6836
Email: aceresney@debevoise.com
lzornberg@debevoise.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only notices and papers referred to in PROMESA, the Bankruptcy Code, and the Bankruptcy Rules, but also includes, without limitation, any orders and notice of any application, complaint, demand, motion, petition, pleading, or request whether formal or informal, written or oral, and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, telex, hand delivery, overnight carrier, or otherwise filed or made with regard to the above-captioned Title III Case and any proceedings therein, all of which are to be sent to the attorneys listed above.

PLEASE TAKE FURTHER NOTICE that the undersigned intend that neither this Notice of Appearance and Request to Receive Notifications nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of the rights of GoldenTree: (i) to trial by

jury in any proceeding so triable in the Title III Case or any case, controversy, or proceeding related to the Trial III Case; and (ii) to any other rights, claims, actions, defenses, setoffs, recoupments, or remedies to which GoldenTree is or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, recoupments and remedies are expressly reserved.

WE HEREBY CERTIFY that we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, October 22, 2020.

By:

REICHARD & ESCALERA

/s/Rafael Escalera

Rafael Escalera

USDC No. 122609

escalera@reichardescalera.com

/s/Sylvia M. Arizmendi

Sylvia M. Arizmendi

USDC-PR 210714

arizmendis@reichardescalera.com

/s/Carlos R. Rivera-Ortiz

Carlos R. Rivera-Ortiz

USDC-PR 303409

riverac@reichardescalera.com

255 Ponce de León Avenue

MCS Plaza, 10th Floor

San Juan, Puerto Rico 00917-1913

(787) 777-8888

DEBEVOISE & PLIMPTON LLP

Andrew J. Ceresney (*pro hac vice
forthcoming*)

aceresney@debevoise.com

Lisa Zornberg (*pro hac vice forthcoming*)

lzornberg@debevoise.com

919 Third Avenue

New York, New York 10022

Co-Counsel for GoldenTree Asset Management LP